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ATTORNEYS FOR
DEBTOR-IN-POSSESSION

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In re: BOTW HOLDINGS, LLC Debtor	Case No. 24-20138 Chapter 11 (Subchapter V)
In re: HUSKEMAW OPTICS, LLC Debtor	Case No. 24-20141 Chapter 11 (Subchapter V)
In re: BEST OF THE WEST PRODUCTIONS, LLC Debtor	Case No. 24-20142 Chapter 11 (Subchapter V) Jointly Administered Under Case No. 24-20138

DEBTORS' REPORT PURSUANT TO 11 U.S.C. § 1188(C)

Debtors BOTW Holdings, LLC (“Holdings”), Huskemaw Optics, LLC (“Huskemaw”), and Best of the West Productions, LLC (“Productions”) (collectively the “Debtors”), debtors and debtors-in-possession in the above-captioned jointly administered

chapter 11 cases, by and through their undersigned counsel, hereby file this report pursuant to 11 U.S.C. § 1188(c) and state as follows:¹

A. Debtors' Business Background

1. The Debtors are Wyoming limited liabilities companies with shared principal offices located at 115 West Yellowstone Avenue, Cody, Wyoming 82414.

2. Holdings is a holding company and the sole member and 100% owner of Optics and Productions, as well as three other non-debtor subsidiaries.

3. The majority owner and member of Holdings is Stryk Group Holdings, LLC. Stryk Group Holdings, LLC is managed by Jeffrey Edwards and Chase Myers. Jeffrey Edwards and Chase Myers also manage Holdings, Optics, and Productions.

4. Stryk Group Holdings, LLC acquired Holdings on or around March 9, 2024.

5. The Debtors are involved in the outdoor industry, having evolved from their original focus on outdoor industry video production company to offering long-range shooting systems.

B. Reasons for Filing Bankruptcy

6. On February 8, 2018, and nearly six years prior to Stryk Group Holdings, LLC acquiring Holdings, John A. McCall Jr. ("McCall"), a prior member of Productions, commenced a lawsuit and Productions and Optics seeking company dissolution, declaratory judgment and injunctive relief in the District Court of the Fifth Judicial District, State of Wyoming, County of Park (the "State Court"), Civil Action No. 29026 (the

¹ Unless otherwise specified, all references herein to "Section," "§," "Bankruptcy Code" and "Code" refer to the U.S. Bankruptcy Code, 11 U.S.C. § 101, *et seq.*

“McCall Litigation”).

7. Upon information and belief, Holdings eventually became a named defendant in the McCall Litigation.

8. On March 19, 2024, and after years of protracted litigation, the State Court entered its Amended Judgment in favor of McCall and against the Debtors for \$2,441,523.57 (the original Judgment was reduced by nearly \$1.5 million after Debtors filed a motion for post judgment relief pursuant to W.R.C.P. 59 and 60).

9. Both McCall and the Debtors filed notices of appeal of the Amended Judgment prior to the Petition Date.

10. On or around March 14, 2022, and during the pendency of the McCall Litigation, Holdings executed a Promissory Note (the “Note”) in the principal amount of \$2,500,000.00 in favor of First Bank of Wyoming. The term of the Note was for one-year, which term was extended by agreement of the parties to the Note.

11. Upon information and belief, on the Petition Date the amount due under the Note remained \$2,500,000.00 and the term of the Note is set to expire in 2024, with the entire balance due thereunder becoming immediately due and payable.

12. The Debtors filed for protection under Subchapter V of chapter 11 of the Bankruptcy Code in order to, in part, prevent the dismantling of its operations by a judgment lien creditor to the detriment of all other creditors, including First Bank of Wyoming. The purpose of the bankruptcy case is to restructure the debts of the Debtors (which would include the claims of McCall and First Bank of Wyoming) in an effort to preserve the business of the Debtors as a going concern while providing a meaningful

distribution to their unsecured creditors.

C. Efforts Toward Formulation of a Consensual Plan and Anticipated Disputes

13. Since the Petition Date, the Debtors have been focused on compliance issues under the Bankruptcy Code primarily related to preparing schedules of assets and liabilities (the “Schedules”) and statements of financial affairs (“SOFA”). Now that the Debtors have obtained the Court’s approval to retain BMC Group, Inc., the Debtors are diligently working with BMC Group, Inc. on their Schedules and SOFA.

14. Because the Debtors are yet to file their Schedules and SOFA, it has proven difficult to have productive Plan negotiations with their creditors (that said, settlement discussions have taken place and the Debtors have attempted to liquidate the disputed pre-petition claim of McCall by agreement). Specifically, creditors are unable to make informed decisions as to any proposed Plan treatment because creditors are unable to ascertain the Debtors’ financial position and access the valuation of the Debtors’ assets.

15. The Debtors are hopeful that once its Schedules and SOFA are filed, they will be better positioned to negotiate Plan treatment with creditors and put forth a consensual, and confirmable, Plan. The Debtor is unable at this juncture to forecast what disputes might arise should a consensual Plan become unlikely.

Dated: Cheyenne, Wyoming
May 29, 2024

MARKUS WILLIAMS YOUNG AND
HUNSICKER LLC

By: /s/ Bradley T. Hunsicker
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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2024, I caused a true and correct copy of the foregoing **DEBTORS' REPORT PURSUANT TO 11 U.S.C. § 1188(C)** to be served, upon the parties indicated below as follows:

Via CM/ECF:

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/s/ Bradley T. Hunsicker

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